

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

<p>ATTILA BIBER, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>PIONEER CREDIT RECOVERY, INC.,</p> <p>Defendant.</p>	<p>E.D. Virginia Case No. 16-CV-804 (TSE)</p>
<p>ATTILA BIBER and SANDRA LEVY, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>GENERAL REVENUE CORPORATION,</p> <p>Defendant.</p>	<p>E.D. Virginia Case No. 17-CV-205 (TSE)</p>
<p>SARA KOZAK, formerly known as SARA LEMKE and SARA AZZALINE, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>PIONEER CREDIT RECOVERY, INC.,</p> <p>Defendant.</p>	<p>N.D. Illinois Case No. 17-CV-318</p>

CONSENT MOTION TO EXCEED PAGE LIMIT FOR BRIEF

COMES NOW Plaintiffs, by counsel, and respectfully moves this Court for leave to exceed 30 pages in their Memorandum in Support of Settlement. In support thereof, Plaintiffs states the following:

This case involves 3 consolidated Class Actions against 2 different defendants. The parties settled the consolidated cases and this Court entered a Preliminary Approval Order on July 24, 2017, which was amended by virtue of an Amended Order of Preliminary Approval, entered on July 28, 2017. Pursuant to the Amended Order, Plaintiffs' Memorandum in Support of the Settlement is due December 21, 2017. Plaintiffs have prepared said Memorandum. However due to the complexity of the issues involved, as well as the need to address the objections raised by a few class members, the Memorandum exceeds the 30 page limit for briefs found at Local Rule of Civil Procedure 7(f). Plaintiffs could separate the Memorandum into 2 separate Memorandums, one in Support of the Settlement, and one in Support of a Petition for Attorney Fees; however, judicial economy would be served by having only one, consolidated Memorandum. Plaintiffs therefore seek leave to file a Memorandum not to exceed 45 pages in support of the Settlement.

Defendants have consented to this Motion.

WHEREFORE, Plaintiffs, prays that the Court enter the Consent Order granting Plaintiffs leave to file a Memorandum in Support of Approval of the Class Action Settlement, not to exceed 45 pages.

RESPECTFULLY SUBMITTED,

_____/s/_____
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CERTIFICATE OF SERVICE

I certify that on the 21st day of December, 2017 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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